

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MAXUS METROPOLITAN, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No: 20-cv-00095-FJG
)	
TRAVELERS PROPERTY CASUALTY)	
COMPANY OF AMERICA,)	
)	
Defendant.)	

**TRAVELERS PROPERTY CASUALTY INSURANCE COMPANY OF
AMERICA’S DEPOSITION DESIGNATIONS**

Travelers Property Casualty Insurance Company of America (“Travelers”), pursuant to the Court’s Amended Trial Order [Doc. 146] and Federal Rule of Civil Procedure 26(a)(3)(A)(ii), provides the following deposition designations. Travelers states that it may present the testimony of the following witnesses by deposition:

Ron McRae

The pertinent portions of Mr. McRae’s deposition that Travelers may present are as follows:

- trpp. 7:12–8:3
- trpp. 12:2–14:12
- trpp. 15:13–16:21
- trpp. 32:22–33:19
- trpp. 37:22–42:23

- trpp. 50:22–54:16
- trpp. 55:18–56:22
- trpp. 68:20–85:13
- trpp. 93:19–95:1
- trpp. 95:20–119:15
- trp. 125:12 – 15
- trpp. 125:22–135:1
- trpp. 135:13–145:14
- trp. 173:19–23
- trp. 174:12 –15
- trpp. 181:19–189:15
- trpp. 201:8–202:18

Sean Fee

The pertinent portions of Mr. Fee’s deposition that Travelers may present are as follows:

- trp. 6:7–17
- trpp. 9:16–13:22
- trp. 25:11–17
- trpp. 26:23–27:8

- trpp. 27:10–30:2
- trp. 31:3–4
- trpp. 33:20–37:10
- trp. 41:7–16
- trpp. 42:11–50:5
- trp. 50:6–7
- trpp. 51:20–62:3
- trpp. 64:4–66:11
- trpp. 73:8–75:4
- trpp. 81:7–82:4
- trpp. 95:17–98:13

Respectfully submitted,

/s/Brenen G. Ely

Brenen G. Ely (*pro hac vice*)

Lauren A. Wiggins (*pro hac vice*)

Attorneys for Defendant Travelers Property
Casualty Company of America

OF COUNSEL:

ELY & ISENBERG, LLC

3500 Blue Lake Drive, Suite 345

Birmingham, Alabama 35243

Telephone: (205) 313-1200

Facsimile: (205) 313-1201

bely@elylawllc.com

lwiggins@elylawllc.com

Daniel E. Hamann
Attorney for Defendant Travelers Property
Casualty Company of America

OF COUNSEL:

DEACY & DEACY, LLP
920 Main Street, Suite 1000
Kansas City, Missouri 64105
Telephone: (816) 421-4000
Facsimile: (816) 421-7880
deh@deacylaw.com

CERTIFICATE OF SERVICE

I do hereby certify that on March 17, 2023, I electronically submitted the foregoing with the Clerk of the Court for the United State District Court for the Western District of Missouri using the CM/ECF system, which will send a Notice of Electronic Filing to the following counsel of record:

Michael J. Abrams
Kimberly K. Winter
Brian W. Fields
Noah H. Nash
Alana M. McMullin
Lathrop GPM, LLP
2345 Grand Boulevard, Suite 2200
Kansas City, Missouri 64108-2618
Telephone: (816) 292-2000
Facsimile: (816) 216-2001
michael.abrams@lathropgpm.com
kim.winter@lathropgage.com
brian.fields@lathropgpm.com
noah.nash@lathropgpm.com
alana.mcmullin@lathropgpm.com

/s/Brenen G. Ely
OF COUNSEL